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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JEREMY ANDERSON, as guardian of the
person and estate of William Anderson;
JEREMY ANDERSON, (individually and as the
father of William Anderson); and **JULIANA
ANDERSON** (individually, and as the mother of
William Anderson,

Plaintiffs,

v.

CLARK COUNTY SCHOOL DISTRICT,
Defendant.

CASE NO. 2:24-cv-01514-CDS-EJY

**STIPULATION AND ~~PROPOSED~~ ORDER TO
MODIFY DISCOVERY PLAN AND SCHEDULING ORDER**

[THIRD REQUEST]

The parties, Plaintiffs Jeremy Anderson as guardian of the person and estate of William Anderson; Jeremy Anderson, individually and as the father of William Anderson; and Juliana Anderson, individually and as the mother of William Anderson (collectively “Plaintiffs”) and Defendant Clark County School District (“CCSD”), through their undersigned counsel, hereby make their third request to modify the stipulated discovery plan and scheduling order, as follows:

1. STATEMENT OF DISCOVERY COMPLETED

At the Court's direction, the parties submitted their stipulated discovery plan and scheduling order on November 1, 2024 [ECF 10] and the Court entered its scheduling order on November 4, 2024 [ECF 11]. On December 20, 2024, the parties stipulated to, and the Court approved, a first request to modify the discovery plan and scheduling order [ECF 16]. On March 31, 2025, the parties stipulated to, and the Court approved on April 1, 2025, a second request to modify the discovery plan and scheduling order [ECF No. 19, 20]. The parties have completed the following discovery to date:

A. DISCLOSURES

1. On November 6, 2024, Plaintiffs served their initial disclosures.
2. On January 23, 2025, Plaintiffs served their first supplement disclosures.
3. On March 24, 2025, Plaintiffs served their second supplement disclosures.
4. On April 17, 2025, Plaintiffs served their third supplemental disclosures.
5. On May 21, 2025, Plaintiffs served their fourth supplemental disclosures.
6. On May 23, 2025, Plaintiffs served their fifth supplemental disclosures.
7. On May 29, 2025, Plaintiffs served their sixth supplemental disclosures.
8. On June 3, 2025, Plaintiffs served their seventh supplemental disclosures.
9. On November 7, 2024, Defendant served its initial disclosures.
10. On January 9, 2025, Defendant served its first supplement disclosure.
11. On February 26, 2025, Defendant served its second supplement disclosure.
12. On March 10, 2025, Defendant served its third supplement disclosure.
13. On March 18, 2025, Defendant served its fourth supplement disclosure.
14. On April 10, 2025, Defendant served its fifth supplemental disclosures.
15. On April 14, 2025, Defendant served its sixth supplemental disclosures.
16. On May 2, 2025, Defendant served its seventh supplemental disclosures.
17. On May 19, 2025, Defendant served its eighth supplemental disclosures.
18. On June 20, 2025, Defendant served its ninth supplemental disclosures.

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B. REQUESTS FOR PRODUCTION OF DOCUMENTS

19. On November 26, 2024, Plaintiffs served their First Set of Requests for Production of Documents to Defendant. Defendant responded on January 9, 2025, and supplemented its response on February 26, 2025.

20. On December 23, 2024, Plaintiffs served their Second Set of Requests for Production of Documents to Defendant. Defendant responded on January 27, 2025, and supplemented its response on February 26, 2025.

21. On January 27, 2025, Plaintiffs served their Third Set of Requests for Production of Documents to Defendant, and Defendant responded on February 26, 2025.

22. On February 4, 2025, Plaintiffs served their Fourth Set of Requests for Production of Documents to Defendant, and Defendant responded on March 10, 2025.

23. On April 14, 2025, Plaintiffs served their Fifth Set of Requests for Production of Documents to Defendants, and Defendants responded on May 19, 2025.

24. On May 5, 2025, Plaintiffs served their Sixth Set of Requests for Production of Documents to Defendants, and Defendants responded on June 4, 2025.

25. On May 15, 2025, Plaintiffs served their Seventh Set of Requests for Production of Documents to Defendants, and Defendants responded on June 16, 2025.

26. On December 16, 2024, Defendant served its First Set of Requests for Production of Documents to Plaintiffs, and Plaintiffs responded on January 23, 2025.

C. INTERROGATORIES

27. On November 26, 2024, Plaintiffs served their First Set of Interrogatories to Defendant, and Defendant responded on January 9, 2025. Defendant amended its response on June 9, 2025.

28. On January 27, 2025, Plaintiffs served their Second Set of Interrogatories to Defendant, and Defendant responded on February 26, 2025.

29. On February 4, 2025, Plaintiffs served their Third Set of Interrogatories to Defendant, and Defendant responded March 10, 2025.

30. On March 14, 2025, Plaintiffs served their Fourth Set of Interrogatories to

Defendant, and Defendant responded on April 14, 2025.

31. On March 19, 2025, Plaintiffs served their Fifth Set of Interrogatories to Defendant, and Defendant responded on April 18, 2025.

32. On December 16, 2024, Defendant served its First Set of Interrogatories to Plaintiffs, and Plaintiffs responded on January 23, 2025.

D. REQUESTS FOR ADMISSION

33. On May 5, 2025, Plaintiffs served their First Set of Requests for Admission to Defendant, and Defendant responded on June 4, 2025.

34. On May 19, 2025, Plaintiffs served their Second Set of Requests for Admission to Defendant, and Defendant responded on June 18, 2025.

E. SUBPOENAS

35. On February 6, 2025, Defendant served a subpoena on Michelle McGuire, Creative Behavioral Connections.

36. On March 7, 2025, Defendant served a subpoena on Chelsea Sandusky, Intermountain Healthcare Durango Pediatrics Clinic.

37. On March 10, 2025, Defendant served subpoenas on Intermountain Healthcare Durango Pediatrics Clinic and Valleyview Elementary School.

38. On March 12, 2025, Defendant served a subpoena on Valleyview Elementary School, Polk County School District.

39. On May 30, 2025, Defendant served a subpoena on Lisa Portacio.

F. DEPOSITIONS

40. On March 27, 2025, Plaintiff deposed three witnesses.

41. On April 1, 2025, Defendant deposed one witness.

42. On April 3, 2025, Plaintiff deposed two witnesses.

43. On April 7, 2025, Defendant deposed one witness.

44. On April 8, 2025, Plaintiff deposed two witnesses.

45. On April 15, 2025, Plaintiff deposed two witnesses.

46. On May 1, 2025, Defendant deposed one witness.

47. On May 13, 2025, Defendant deposed one witness.

2. STATEMENT OF DISCOVERY THAT REMAINS TO BE COMPLETED

The following discovery remains to be completed:

1. Plaintiffs' deposition of Defendant's 30(b)(6) witness currently scheduled for July 11, 2025.

2. Production of records subject to Defendant's pending Motion to Compel Plaintiffs Jeremy and Juliana Anderson to respond to Defendant's written discovery requesting they execute a release for medical records and provide the names of their medical providers;

3. Completion of Plaintiff William Anderson's Rule 35 psychological exam by Defendant, subject to Defendant's pending Motion to Compel;

4. Deposition of Plaintiff Juliana Anderson, whose deposition was continued and will be re-noticed following this Court's ruling on Defendant's Motion to Compel;

5. Disclosure of Experts, Expert Reports; and

6. Expert Discovery Depositions.

3. REASONS WHY DISCOVERY WILL NOT BE COMPLETED BY THE CURRENT DISCOVERY CUTOFF

Under the current deadlines, initial expert disclosures are due on July 21, 2025. The parties require additional time before making initial expert disclosures to complete CCSD's 30(b)(6) deposition and to allow for rulings from this Court on the pending Motions to Compel, including the completion of CCSD's Rule 35 exam of Plaintiff William Anderson, if granted. Accordingly, an extension of 30 days for all unexpired discovery deadlines is requested.

4. PROPOSED SCHEDULE

The parties hereby stipulate and agree that the deadlines to complete discovery as set forth in the Scheduling Order [ECF 19] shall be extended by sixty (30) days as follows:

1. **INITIAL EXPERT DISCLOSURE:** The deadline to file initial expert reports shall be extended from July 21, 2025, to Wednesday, August 20, 2025.

2. **REBUTTAL EXPERT DISCLOSURE:** The deadline to file rebuttal expert reports shall be extended from August 19, 2025, to Thursday, September 18, 2025.

3. **EXPERT DISCOVERY PERIOD:** The deadline to complete expert discovery shall be extended by thirty-two (32) days from September 18, 2025, to Monday, October 20, 2025 (the thirtieth (30th) day falls on Saturday, October 18th and is advanced to Monday, per Fed. R. Civ. P. 6(a)(1)(C)).

4. **DISPOSITIVE MOTIONS:** The deadline to file dispositive motions shall be extended from October 20, 2025, to Wednesday, November 19, 2025.

5. **PRETRIAL ORDER:** If no dispositive motions are filed, the Joint Pretrial Order shall be filed thirty (30) days after the date for filing the dispositive motions. Therefore, the joint pretrial order shall be extended from November 19, 2025, to Friday, December 19, 2025. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the decision on the dispositive motions or by further order of the court.

This stipulation and order is sought in good faith, for good cause, and not for the purposes of delay. This is the third request for a scheduling extension.

IT IS SO STIPULATED.

DATED this 25th day of June 2025.

DATED this 25th day of June 2025.

**WOLF, RIFKIND, SHAPIRO,
SCHULMAN & RABKIN, LLP**

GREENBERG TRAUIG, LLP

/s/ Douglas Cohen

/s/ Whitney Welch-Kirmse

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Counsel for Plaintiffs

***Counsel for Defendant,
Clark County School District***

ORDER

In consideration of the stipulation by the parties, and with good cause appearing,

1. **INITIAL EXPERT DISCLOSURE:** The deadline to file initial expert reports shall be extended from July 21, 2025, to Wednesday, August 20, 2025.

2. **REBUTTAL EXPERT DISCLOSURE:** The deadline to file rebuttal expert reports shall be extended from August 19, 2025, to Thursday, September 18, 2025.

3. **EXPERT DISCOVERY PERIOD:** The deadline to complete expert discovery shall be extended from September 18, 2025, to Monday, October 20, 2025.

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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE
DATED: June 25, 2025